PRIVACY MANUAL

Documentation prepared in compliance with the provisions set out in the GDPR 2016/679 "General Data Protection Regulation" and in the current national legislation Via Guido Rossa, 29/a 35020 Ponte San Nicolò (PD) Tel. +39 049 8961120 - Fax +39 049 8961090 E-mail: info@betastudio.it

Dear Madam / Dear Sir / Messrs. Supplier (Consultant / Company) At their headquarters

SUBJECT: Information pursuant to and for the purposes of articles 13 and 14 of the GDPR UE 2016/679, as well as of the Italian regulations in force, concerning the protection of the processing of personal data.

In your capacity as "Data Subject" and / or "Data Controller", namely the subject to which the data being processed refer and / or are responsibly managed by you, we wish to inform you about the fundamental elements that are taken into account in the processing of your personal data.

Purpose of the processing.

The collection and processing of personal data is carried out in order to conduct:

- 1. the fulfilment of all processing operations imposed by legal obligations;
- 2. the establishment and execution of contractual relationships in progress, as well as any pre and post contractual assistance activities;
- 3. the operations strictly connected and instrumental in starting such contractual relationships, from the acquisition of preliminary information to the conclusion of the Contract;
- 4. the management of Supplier relationship with respect to administration, accounting, orders, shipments, invoicing, services, dispute settlement issues;
- 5. possible Supplier prequalification followed by Supplier evaluation and possible qualification, on the basis of the ISO 9001:2015 and 14001:2015 specifications, GDPR EU 2016/679 and current Italian legislation;

and will be subject to processing based on the principles of correctness, lawfulness, transparency and protection of your privacy and your rights.

The contractual purposes related to the purchase of products and services, to commercial and non-commercial disputes as well as to promotional activities concern the processing of the personal data of the Supplier only. The Supplier's personal data will be processed for the entire duration of the contractual relationships and also later for the fulfilment of all legal obligations as well as for future commercial purposes.

Processing method.

The processing of data for the purposes set out takes place either in digital or paper form, in compliance with the rules of confidentiality and security required by law, the resulting regulations and internal provisions.

Place of processing.

The data are currently processed and stored at the operating office of the writer, in Via Guido Rossa, 29/a - 35020 Ponte San Nicolò (Padova Province) Italy. They are also processed, on behalf of the undersigned, by professionals and / or companies charged with carrying out technical, development, management and administrative & accounting activities.

Mandatory or optional nature of providing data.

Some data are indispensable for the establishment of the contractual relationship or for its execution, while others can be defined as accessories for these purposes. The provision of data to BETA STUDIO SRL is mandatory only for data for which there is a legal or contractual obligation.

Consequences of data denial.

In cases where the provision of data is required by a regulatory or contractual obligation, any refusal would put BETA STUDIO SRL in the conditions of not being able to give execution or continuation to the Contract, as it would constitute an unlawful processing. In cases where there is no legal obligation to provide data, the refusal would not have the consequences mentioned above but would still prevent the execution of ancillary operations.

Data communication.

Without prejudice to the communication and dissemination activities carried out in compliance with legal obligations, the data relating to your legal Person may be communicated in Italy and / or abroad to:

- Professionals and consultants, consultancy companies, factoring companies, credit institutes, debt collection companies, credit insurance companies, commercial information companies, companies operating in the transport sector;
- Public and private entities, also following inspections or audits by, e.g.: Financial Administration, Tax Police, Judicial Authorities, Italian Exchange Office, Labour Inspectorate, Local Health Authority, Social Security Agencies, Chamber of Commerce, etc.;
- Other companies of the Group, including those based abroad (see the following specific point);
- Any Subject who can access your data pursuant to law provisions;
- Sensitive data, even if processed in a completely anonymous form, will not be subject to any form of diffusion and / or transfer, except for the achievement of the purposes hereby set out and upon your specific written authorization.

Data transfer abroad.

Your data may be communicated and / or transmitted abroad, including to non-European third countries, only for: (i) the performance of the obligations arising from a contract and / or the mandate of which you are an interested party; (ii) to fulfil specific requests before the conclusion of the contract; (iii) for the conclusion or execution of a contract stipulated in your favour in full compliance with art. 44 of

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the GDPR 2016/679; (iv) for purely technical reasons related to the structure of the Company Information System and / or to the application of technical and organizational security measures deemed appropriate by the Data Controller (Article 32 of the GDPR 2016/679).

Data retention periods:

The data provided will be stored in our archives according to the following rules:

- For administrative and accounting activities, purchasing orders, budget and production flow management, assistance and maintenance, shipping, invoicing, delivery of services, settlement of any dispute: 10 years as established by law according to the provisions of art. 2220 of the Italian Civil Code, unless delayed payments of sums due justify its storage extension;
- For supplier evaluation purposes: 36 months.

Rights of the Data Subject.

With regard to his/her personal data, the Supplier may exercise his/her statutory rights within the limits and on the conditions set out in articles from 15 to 22 of the GDPR 2016/679 and by the national legislation in force. In case of signing any form of consent to the processing by BETA STUDIO SRL, the Data Subject can revoke it at any time, without prejudice to the obligations of the legislation in force at the time of his/her request for revocation, by contacting the Data Controller at the address indicated below.

Right to Complaint

Data Subjects who believe that the processing of their personal data through this site is in violation of the provisions of the 2016/679 GDPR have the right to file a complaint with BETA STUDIO SRL as provided for in Article 77 of the 2016/679 GDPR, or to bring the proceedings before the appropriate courts (Article 79 of the 2016/679 EU REGULATION).

Data Controller.

The Data Controller you can turn to in order to assert the rights referred to in Articles 15 to 22 of the GDPR 2016/679 and in the current national legislation, is BETA STUDIO SRL, with headquarters in Via Guido Rossa, 29 / a - 35020 Ponte San Nicolò (PD). You may also exercise the aforementioned rights by writing to the following e-mail address: info@betastudio.it.

Ponte San Nicolò16/07/2018

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